

# **Exhibit D**



Aaron Wright &lt;aaron@holcombward.com&gt;

**Re: Deposition on September 27, 2024**

1 message

**Floyd Landis** <floyd@floydsofleadville.com>

Mon, Sep 23, 2024 at 1:42 PM

To: "Barrie Clapham (LSIL)" &lt;barrie.clapham@lsi.ltd&gt;

Cc: "Daniel J. Vedra" <dan@vedralaw.com>, Bob Bell <bob@floydsofleadville.com>, Paul Rachmuth <paul@paresq.com>, Mark Leonard <markleonard1121@gmail.com>, Greg Hurley <greghurley99@gmail.com>, "bryan.ward@holcombward.com" <bryan.ward@holcombward.com>, Bryan McKenna <bam@mckennalegal.nyc>, "holly@holcombward.com" <holly@holcombward.com>, "aaron@holcombward.com" <aaron@holcombward.com>, Frank DiMartini <frankdimartini@gmail.com>, Jonathan Gazdak <jgazdak@alexandercapitalllp.com>

We are all very impressed that you figured out how to access your email account. Congratulations.

----- Original Message -----

On 9/23/24 11:31 AM, Barrie Clapham (LSIL) wrote:

Floyd

Please don't send me any more emails. Your attorney has the contact details of mine if communication is necessary.

Sent from my iPhone

On 23 Sep 2024, at 17:24, Floyd Landis &lt;floyd@floydsofleadville.com&gt; wrote:

Here we go again with the game they play in which they all pretend to be unassociated and then behind the scenes spend all their time conspiring together to make sure their fraud goes unpunished. Just as Tim, who has done countless deals with these stooges including in Stewart's Holdings which commenced after Redemption sued us and before we settled, is being called an employee of FoL; just as Mark Leonard was handed all of the work we did for 4 years in Jan 2020 by the misnamed "advisory board" so he'd have a turnkey CBD brand that he called Above Holdings (a truly moronic name indeed, and even with all the confidential information having been handed to him, he still failed, but I digress); just like Bullshit Barrie, Pedo Greg, Fraudster Frank, and High-horse Howard all deciding that they can collude to steal FoL while purporting to be negotiating in good faith, terms on loans which had no terms because Alexander Capital is nothing but a grift by a couple of Jerkey Boys sounding dipshits and nobody actually runs the place - just like all that -, this rodent who calls himself a lawyer, is all of a sudden unavailable because he needs to buy time for Pedo Greg to dream up some plausible answers to unanswerable questions.

We will take his deposition on Friday and that is not going to change whether Mickey Mouse esquire is available or not. Because his lie about Marks "holding vigil" by the side of his father's deathbed is belied by his own wife's Facebook page where, on the very day he uttered the stupid statement "holding vigil", she posted pictures showing Marks smiling face at the dinner celebration of his 60th birthday. Marks only skill is swinging a club at small moving objects, and even at that he was barely above average. These liars can go to the court and tell the judge why we have to keep believing this bullshit. We will take Pedo Greg's deposition Friday or we can go show these pictures to the judge.

Mickey Mouse is doing Pedo Greg's bidding here because he represents Stewart's Holdings. It's no coincidence that he became unavailable an hour after you emailed Pedo (hopefully

everyone understands that when I use the word Pedo I mean Greg - see attached) to tell him that we expect him to appear next Friday.

See attached exhibits 1 and 2 below.

----- Original Message -----

On 9/23/24 9:06 AM, Daniel J. Vedra wrote:

Floyd,

Sorry, I forgot to copy you on this e-mail.

Dan

<image001.png>

1444 Blake Street

Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

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**From:** Daniel J. Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)>  
**Sent:** Monday, September 23, 2024 9:00 AM  
**To:** 'Paul Rachmuth' <[Paul@paresq.com](mailto:Paul@paresq.com)>  
**Cc:** 'Bryan Ward' <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; 'Bryan McKenna' <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; 'Holly Cole' <[holly@holcombward.com](mailto:holly@holcombward.com)>; 'Aaron Wright' <[aaron@holcombward.com](mailto:aaron@holcombward.com)>  
**Subject:** RE: Deposition on September 27, 2024

Paul:

I notified you of this deposition on September 11, 2024. It was not until eight days later, after I served Mr. Hurley, and after I reminded all of the parties in the case, that you notified us that you are unavailable. We have had to reschedule every single deposition in this case. For your clients, we have had to reschedule them multiple times. Your clients have missed nearly every single deadline in this case: initial disclosures, requests for production, answer, requests for admission, scheduling conferences, court ordered deadlines to produce documents, the list goes on.

We are skeptical of the need to reschedule this deposition, particularly in light of the fact that Mr. Hurley is business partners with Mr. Clapham and one of the largest shareholders in another company (Stewart Enterprises Holdings Inc.) that was taken over in similar fashion that Redemption Holdings attempted to take over FoL and for which you are the general counsel. And we are especially skeptical that this deposition needs to be postponed based upon the text messages exchanged between Mr. Hurley and Mr. Clapham wherein Mr. Hurley and Mr. Clapham discussed using Mark Leonard's cousin to surreptitiously draft pleadings for Mr. Leonard. It seems like another game that Mr. Clapham and Mr. Hurley are playing to delay this case.

Dan

<image001.png>

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**From:** Paul Rachmuth <[Paul@paresq.com](mailto:Paul@paresq.com)>  
**Sent:** Thursday, September 19, 2024 7:04 PM  
**To:** 'Daniel J. Vedra' <[dan@vedralaw.com](mailto:dan@vedralaw.com)>  
**Cc:** 'Bryan Ward' <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; 'Bryan McKenna' <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; 'Holly Cole' <[holly@holcombward.com](mailto:holly@holcombward.com)>; 'Aaron Wright' <[aaron@holcombward.com](mailto:aaron@holcombward.com)>  
**Subject:** RE: Deposition on September 27, 2024

Daniel,

I am not available on Friday, September 27, 2024.

PAR

*Paul A. Rachmuth*

Attorney at Law

265 Sunrise Highway, Ste. 1515

Rockville Centre, New York 11570

Telephone: (516) 330-0170

Facsimile: (516) 543-0516

Email: [paul@paresq.com](mailto:paul@paresq.com)

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**From:** Daniel Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)>  
**Sent:** Thursday, September 19, 2024 7:26 PM  
**To:** [greghurley99@gmail.com](mailto:greghurley99@gmail.com); [slickrunnr1@aol.com](mailto:slickrunnr1@aol.com)  
**Cc:** Bryan Ward <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; Bryan McKenna <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; Holly Cole <[holly@holcombward.com](mailto:holly@holcombward.com)>; Aaron Wright <[aaron@holcombward.com](mailto:aaron@holcombward.com)>; Paul Rachmuth <[Paul@paresq.com](mailto:Paul@paresq.com)>  
**Subject:** Deposition on September 27, 2024

Dear Mr. Hurley:

Please find attached correspondence concerning your deposition on September 27, 2024.

Regards,

Dan Vedra

<image001.png>

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[Denver, CO 80202](#)

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**Fax:** (303) 937-6547

<signal-2024-09-19-19-36-11-953~2.jpg>  
<Screenshot 2024-09-20 at 9.35.57 AM.jpg>  
<GREG HURLEY.DD.USA.Floyds of Leadville.Attachment (1).pdf>